

**Department of Health and Human Services
Health Care Financing Administration
Operational Policy Letter #106
OPL99.106**

Date: November 10, 1999

Subject: Final Verification Review of Medicare Managed Care
Marketing Materials

Effective Date: Immediately

PURPOSE:

The purpose of this OPL is to provide additional information regarding HCFA's final verification review of Medicare Managed Care Marketing Materials. Based on instructions issued to contracting Medicare+Choice Organizations (M+CO) in a letter of July 26, 1999, regional offices (RO) must now conduct final verification on beneficiary notification marketing materials before HCFA approval is assigned to the materials.

Final Verification Review

A list of materials determined to be beneficiary notification marketing materials and thus subject to final verification is attached. This list is provided to assist M+COs in determining the nature of notification materials so they can be identified. The listing **is not** meant to be all inclusive because notification materials will evolve to meet the operational needs of the marketplace.

HCFA's final verification review procedure will focus on review of all beneficiary notification materials at the final proof stage. Under special circumstances when final proof copy is not available, blue-line or camera ready copy may be substituted for final proof copy in the final verification review procedure.

HCFA must review the final proof that will be used by the printer to make the camera ready copy for the printing. In cases where the health plan makes its own reproductions of a document rather than using a printer, a final copy of the document that will be used as the master for the reproductions will be required.

Electronic transmission of documents and approval/rejection notifications between the health plan and HCFA is acceptable, but not required, so long as some form of permanent record is available for RO file purposes.

Final verification should not be the time for reviewers to find new problems or errors in marketing material that were missed in the initial review(s). Errors should have been found during the text version review. The final verification review is to confirm that the final text version has not changed after the initial text version was accepted by HCFA.

Definitions Associated With Final Verification Activity

Beneficiary Notification Materials - The classification of HCFA regulated marketing materials which are used by M+COs to explain health care benefits and services to existing or potential M+CO members (e.g., the Evidence of Coverage and Summary of Benefits). Notification materials also include any communication documents used by the M+CO to relate instructions or obtain needed information from potential or existing members with regard to operational requirements (e.g., the Annual Notice of Change Letter and the Notification of Failure to Pay Premiums Letter).

Final Proof or Final Laser Proof - Most marketing design is performed electronically (by computer); the final design product is an electronic file containing the exact layout the printer will use to make the camera ready copy that will be used to print the marketing piece. Prior to transmitting the electronic file, a final proof file or printed document is sent to the health care organization for a final review. When approval is given by the organization based on review of the final proof, the electronic file is transmitted to the printer for execution of the print job.

Blue-Line Copy - Health care organizations using a design company or print company that is less sophisticated in computer capability require the use of blue-line copy. The marketing designer will provide the printer with a layout copy of the marketing piece from which the printer will produce a document known as a blue-line copy that will be used for the final print job. The printer will provide the health care organization a copy of the blue-line copy for final review prior to development of the camera ready copy that will be used to print the marketing piece.

Camera Ready Copy - The actual print copy developed from the final proof or blue-line copy that will be used for printing the marketing piece.

Acceptable - A term used when the final text or script version of the beneficiary notification material is satisfactory and the final proof needs to be submitted to HCFA for approval. Approval stamps **should not** be affixed to documents in this stage of the review process.

Approval - A term used when the final proof is approved by HCFA and the marketing material can be published and distributed by the M+CO. Approval stamps (or other methods of reflecting approval) **should** be affixed to documents in this stage of the review process.

Fv - Digits in the HCFA RO control number system indicating that the material is a final proof version.

Txt - Digits in the HCFA RO control number system indicating that the material is a pre-final proof, text version.

Attachment

Contact: HCFA Regional Office Managed Care Staff.

This OPL was prepared by the Center for Health Plans and Providers.



Attachment - 1

Medicare managed care Beneficiary Notification Marketing Materials are those materials used by contracting health plans to convey benefit or plan operational information to potential or enrolled beneficiary health plan members. The following items are examples of Medicare managed care Beneficiary Notification Marketing Materials that must be reviewed/approved by HCFA:

1. Enrollment Applications
2. Enrollment by Mail Forms
3. Enrollment Letters: e.g.
 - (a) Proposed Enrollment Effective Date
 - (b) Receipt of Medical Services Under Medicare Fee-for-Service Prior to Enrollment
 - (c) Confirm Enrollment Effective Date
4. Denial of Enrollment/Disenrollment Letters: e.g.
 - (a) Sending out Disenrollment Form
 - (b) Disenrollment Confirmation
 - (c) Confirmation of Disenrollment Date
 - (d) Failure to Pay Plan Premium
 - (e) Involuntary Disenrollment
 - (f) Confirmation of Involuntary Disenrollment
5. Summary of Benefits
6. Evidence of Coverage
7. Annual Notice of Change Letters
8. Member Handbooks
9. Provider Termination Notices
10. Claims Denial Notices
11. Service Area Reduction Notices
12. Non-Renewal Notices